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Naturextrakte

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Mr. Arthur Neal
Director, Program Administration
National Organic Program
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ref.: Docket Number TM - 04 - 07
Support for Carbon Dioxide in NOP products

Dear Mr. Neal and the National Organic Standards Board,

It is our suggestion to allow carbon dioxide as a processing aid/extraction agent for the production of NOP certified extracts to remain on the National List in Section 205.605. Carbon dioxide, that is obtained from natural volcanic sources or from fermentation processes is suggested to be included in paragraph (a) of nonsynthetics like nitrogen and oxygen.

Reasons:

- Carbon dioxide is the end product of our metabolism and an essential part of the natural life cycle on earth
- Carbon dioxide has the GRAS status by the FDA
- Whereas water and alcohol are available and accepted for extraction of polar compounds carbon dioxide is the only nonhazardous, nontoxic lipophilic solvent for the extraction of nonpolar ingredients that can replace hexane and similar synthetic, objectionable solvents
- Carbon dioxide which is also a harmless component in beer and soft drinks disappears almost completely after the extraction job
- Carbon dioxide is fully accepted by the European Organic Regulation 2092/91 EEC for the production of organic extracts.

Respectfully submitted

Dr. K.-W. Quirin
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